Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59
	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	

REPLY COMMENTS

The Alarm Industry Communications Committee ("AICC")[1] hereby files reply comments in the FNPRM in the above-captioned dockets.[2] The comments make clear that call blocking programs, including call blocking based on call authentication technology, will result in the blocking of legal calls. Accordingly, it is imperative that the Commission require measures to ensure that calls from alarm central stations are never blocked by voice service providers, such as by including calls from alarm central stations in a Critical Call List. Further, consumers must be able to easily remove themselves from any call blocking programs before they are implemented by voice service providers, and alarm companies must be able to easily correct any errors made by the voice service provider when blocking calls. The Commission also should not grant broad safe harbor protections to voice service providers that block calls without the customer's consent at this time.

[1] AICC is comprised of representatives of major associations as well as individual companies in the alarm industry. A list of AICC's members was provided with its comments.
[2] *In re: Advanced Methods to Target and Eliminate Unlawful Robocalls,* Declaratory Ruling and Third Further Notice of Proposed Rulemaking, FCC 19-51, CG Docket No. 17-59, WC Docket No. 17-97, rel. June 7, 2019 (*"FNPRM"*).

The comments make clear that the call blocking mechanisms voice service providers will employ, including SHAKEN/STIR, will result in the blocking of legal calls and calls desired by the called party.[3] The Commission, therefore, must take steps to prevent the blocking of emergency calls, including calls from alarm company central stations. As discussed in AICC's comments, alarm central stations place outgoing calls to their customers to verify the presence of an alarm event before requesting emergency dispatch. The central station will place an outgoing call to a public safety entity, such as PSAPs, police, fire and emergency operations centers to respond to an alarm. The central station may provide additional contextual information describing the situation that the responding public safety personnel will encounter, including the presence of intruders, pets, the language spoken by the occupants, the number of individuals in the building, etc., which can better protect the consumer and the public safety personnel. All of these communications are critical to ensure the life and safety of the alarm customer and the public safety personnel, and they require unrestricted access to the voice networks that connect protected sites, alarm company central stations, and public safety personnel. Accordingly, the Commission should require all voice service providers that engage in call blocking to ensure that these lifesaving calls from central stations are not blocked.

AICC supports the creation of a Critical Call List that would include numbers that could never be blocked. This list should include first responders, emergency services, and the alarm companies that often act as a go-between connecting customers with first responders. AICC agrees that the Commission should facilitate and potentially maintain or oversee a single centralized list of critical numbers. Because alarm central stations operate across many

[3] See, Comments of USTelecom-The Broadband Association at 6. (USTelecom Comments); Comments of AT&T at 11. (AT&T Comments)

jurisdictions and deal with an untold number of voice providers, it would be exceedingly difficult for a small alarm company to ensure its various numbers are included on multiple lists maintained by individual voice service providers. The Commission also must ensure that any such list receives the highest level of security. As stated in AICC's comments, the alarm industry stands ready to work with the Commission, industry, and standards bodies to begin the work of establishing such a list.[4]

The comments make clear that SHAKEN/STIR on its own is not suitable for use for call blocking.[5] According to AT&T, "SHAKEN/STIR is not a suitable tool for determining whether a call is illegal, much less unwanted."[6] AT&T further states that "[n]umerous experts, including at the July 11 Summit, have explained that the presence or absence of SHAKEN/STIR verification *on its own* is neither necessary nor sufficient to indicate that a call should be blocked today."[7]

To overcome its limitations, some voice service providers argue that SHAKEN/STIR should be combined with the use of analytics for the purpose of blocking calls.[8] However, even then, the voice service providers acknowledge that they will block legal calls that the called party wants to receive. For example, in spite of AT&T's procedures, AICC is aware of at least one alarm company central station outbound number that was incorrectly labeled by AT&T as suspected fraud. Although the alarm company contacted AT&T, they were unable to rectify the situation through their contacts. While subsequent counsel to counsel contact resolved the status,

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[4] AICC Comments at 4-5.
[5] USTelecom Comments at 6-7; AT&T Comments at 5-6.
[6] AT&T Comments at 5-6
[7] AT&T Comments at 6.
[8] USTelecom Comments at 8; AT&T Comments at 9.

such a solution is not workable for an industry comprised of as many as ten thousand companies offering alarm monitoring services.

Voice service providers argue that a broad safe harbor from liability is needed when they block legal calls. AT&T proposes that a voice service provider "that inadvertently blocks a legitimate call shall not be deemed to have violated the Communications Act of 1934, as amended, or the Commission's rules, if, at the time the provider blocked the call, the provider:

> (a) performed network blocking of calls in connection with an event that the provider had a good-faith reason to believe was an illegal robocall event;
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> (b) had procedures in place for network blocking that were reasonably likely to confirm that calls blocked were limited to illegal robocalls;
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> (c) followed those procedures; and
>
> (d) had a process in place to unblock legitimate calls in the event of any inadvertent blocking of such calls.

The Commission should not adopt a broad safe harbor on the basis of these procedures as they are not specific enough to ensure that calls from alarm central stations are not blocked. Voice service providers also must implement procedures to ensure that emergency calls, including calls from alarm central stations, are never blocked, such as implementing the Critical Call List. Voice service providers also should identify and make available to unaffiliated alarm companies any additional protections and methods they make available to their own alarm services to avoid mistaken call blocking and to resolve a call-blocking issue when it is identified.

In addition, it is imperative that the Commission require voice service providers to publicly identify contact numbers where individuals can be reached 24 hours a day, seven days a week, who can quickly correct any case when a number is incorrectly blocked. Like the Commission's rural call completion requirements, the Commission should consider a database on

the FCC website where this information can be found. If an alarm company's outgoing number is blocked, it also should receive some type of notice when placing the outbound call so that corrective action can be taken immediately.

The Commission also should not adopt a broad safe harbor at this time. As stated by AARP, there is "uncertainty regarding how robocall blocking technology will initially perform"[9] and there will undoubtedly be implementation and operational problems with blocking mechanisms and procedures as the voice service providers implement them. USTelecom acknowledges that voice service providers are "refining new and existing blocking, screening and filtering tools"[10] and that SHAKEN/STIR is still being tested. In fact, USTelecom states that the SHAKEN/STIR Governance Authority "expects the framework to be launched in by the end of the year."[11] Any consideration of a broad safe harbor should be postponed until the ramifications of the various call blocking procedures that are implemented by voice service providers can be evaluated.

Finally, the comments show that targeted actions against the perpetrators of fraudulent robocalls and the voice service providers that facilitate their operations may be available that would prevent illegal robocalls while minimizing the risk of blocking lawful calls.[12] AICC supports such targeted actions.

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[9] Comments of AARP at 3.
[10] USTelecom Comments at 5.
[11] USTelecom Comments at 4.
[12] For example, AT&T suggests that the Commission should allow voice service providers to block traffic from identified facilitators of fraudulent robocalls. See AT&T Comments at 19- 21. And, Verizon identifies international calls where callers are permitted to insert numbers from the U.S. portion of the North American Numbering Plan as a major source of the robocall problem. See, Verizon Comments on Further Notice at 4.

In summary, while AICC supports efforts to eliminate unlawful robocalls and scam calls, care must be taken to ensure that emergency calls, including calls from alarm central stations, are not blocked. The blocking proposals seen thus far, including SHAKEN/STIR, do not adequately ensure that calls from alarm central stations will not be blocked. Accordingly, AICC asks the Commission to consider the recommendations contained in its Comments and Reply Comments, including the creation of a Critical Call List, to ensure that voice service providers do not block emergency calls, including calls from alarm central stations.

Respectfully submitted,

THE ALARM INDUSTRY COMMUNICATIONS COMMITTEE

Louis T. Fiore
Chairman

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